

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re:	PROMESA
THE FINANCIAL OVERSIGHT AND	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	(Jointly Administered)
Debtors. <sup>1</sup>	

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**JOINT INFORMATIVE MOTION REGARDING PREPA'S MOTION FOR ENTRY OF  
AN ORDER ALLOWING ADMINISTRATIVE EXPENSE CLAIM FOR  
COMPENSATION FOR FRONT-END TRANSITION SERVICES UNDER PUERTO  
RICO TRANSMISSION AND DISTRIBUTION SYSTEM OPERATION AND  
MAINTENANCE AGREEMENT WITH LUMA ENERGY**

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To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for September 16-17, 2020 Omnibus Hearing* [Case No. 17-3283, ECF No. 1402], the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as representative of the Commonwealth of Puerto Rico (the "Commonwealth") pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act ("PROMESA"),<sup>2</sup> Unión de Trabajadores de la Industria Eléctrica y Riego

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

(“UTIER”), Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAEE”), Official Committee of Unsecured Creditors for all Title III Debtors, other than PBA and COFINA (the “Committee”), Cortland Capital Market Services LLC, as successor administrative agent under a Credit Agreement, dated May 4, 2012, among PREPA, Scotiabank de Puerto Rico and certain lenders (collectively, the “Fuel Line Lenders”), Cobra Acquisitions LLC (“Cobra”), Whitefish Energy Holdings, LLC (“Whitefish”) (collectively, the “Parties”) respectfully state as follows:

1. The Parties will appear telephonically at the September 16, 2020 hearing on the *PREPA’s Motion for Entry of an Order Allowing Administrative Expense Claim for Compensation for Front-End Transition Services under Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement with LUMA Energy* [Case No. 17-3283, ECF No. 13583] (the “Motion”) as well as any and all objections, responses, statements, joinders, and replies to the Motion.

2. The following individuals may appear to speak on behalf of the Parties:

- a. PREPA: Martin J. Bienenstock
- b. AAFAF: Peter Friedman
- c. Committee: Luc Despins
- d. Fuel Line Lenders: Michael Cassel
- e. UTIER and SREAEE: Jessica Méndez Colberg
- f. Cobra: Abid Qureshi
- g. Whitefish: Carmen Conde Torres

3. The Parties understand the Court has allocated 40 minutes for a hearing on the Motion. The Parties have agreed to allocate such time as follows:

- a. Movants
  - i. PREPA: 12 minutes
  - ii. AAFAF: 5 minutes
- b. Objecting Parties
  - i. Committee: 5 minutes
  - ii. Fuel Line Lenders: 5 minutes
  - iii. UTIER: 5 minutes
  - iv. Cobra: 3 minutes
  - v. Whitefish: 2 minutes
- c. Movants
  - i. PREPA: 3 minutes

Dated: September 14, 2020.  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock  
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